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11 Attorneys for Plaintiffs, HYPHY MUSIC INC., DOMINGO TORRES, and  
12 ALFONSO VARGAS and Counter-Defendants, DOMINGO TORRES and  
13 ALFONSO VARGAS

14 **UNITED STATES DISTRICT COURT**  
15 **EASTERN DISTRICT OF CALIFORNIA**

16 HYPHY MUSIC INC., a California  
17 corporation; DOMINGO TORRES, an  
18 individual; and ALFONSO VARGAS,  
19 an individual,

20 Plaintiff,

21 v.

22 YELLOWCAKE, INC., a California  
23 corporation; COLONIZE MEDIA, INC.,  
24 a California corporation; KEVIN  
25 BERGER, an individual; JOSE DAVID  
26 HERNANDEZ, an individual; JESUS  
27 CHAVEZ, SR, an individual; JESUS  
28 CHAVEZ, JR, an individual; PEDRO  
CHAVEZ, an individual and JORGE  
GARCIA, an individual.

Defendants.

AND RELATED COUNTER-CLAIM  
ACTION.

**Case No. 1:23-cv-00683-JLT-BAM**

**STIPULATION FOR DISMISSAL OF  
ENTIRE ACTION**

Complaint Filed: May 3, 2023  
Counterclaim Filed: August 31, 2023  
Trial Date: September 9, 2025

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**STIPULATION**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs, HYPHY MUSIC INC., DOMINGO TORRES and ALFONSO VARGAS hereby dismiss their Complaint against Defendants, YELLOWCAKE, INC.; COLONIZE MEDIA, INC.; KEVIN BERGER; JOSE DAVID HERNANDEZ; JESUS CHAVEZ, SR.; JESUS CHAVEZ, JR.; PEDRO CHAVEZ; and JORGE GARCIA with prejudice, and Counter-Claimant JESUS CHAVEZ, SR. dismisses his Counter-Claim against Counter-Defendants, DOMINGO TORRES and ALFONSO VARGAS with prejudice.

The Parties shall each bear their own attorneys' fees and costs.

Dated: January 31, 2025

COLEMAN & HOROWITT, LLP

By: /s/ Sherrie M. Flynn  
SHERRIE M. FLYNN  
AISHA O. OTORI  
Attorneys for Plaintiffs HYPHY MUSIC, INC., DOMINGO TORRES and ALFONSO VARGAS, and Counter-Defendants, DOMINGO TORRES and ALFONSO VARGAS

Dated: January 31, 2025

LAW OFFICE OF LARRY ZERNER

By: /s/ Larry Zerner  
LARRY ZERNER  
Attorneys for Defendants, YELLOWCAKE, INC., COLONIZE MEDIA, INC., KEVIN BERGER, JOSE DAVID HERNANDEZ, JESUS CHAVEZ, SR, JESUS CHAVEZ, JR, PEDRO CHAVEZ, and JORGE GARCIA, and Counterclaimant, JESUS CHAVEZ, SR.

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**ATTESTATION REGARDING SIGNATURES**

Counsel for Plaintiff hereby attests by signature below that concurrence in the filing of this document was obtained from counsel for Defendants.

Dated: January 31, 2025

COLEMAN & HOROWITT, LLP

By: /s/ Sherrie M. Flynn  
SHERRIE M. FLYNN  
AISHA O. OTORI  
Attorneys for Plaintiffs HYPHY MUSIC,  
INC., DOMINGO TORRES and ALFONSO  
VARGAS, and Counter-Defendants,  
DOMINGO TORRES and ALFONSO  
VARGAS